



NORLITE CORPORATION

628 SO. SARATOGA STREET
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PHONE: (518) 235-0401
FAX: (518) 235-0233

April 13, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedances Report
Kiln 1: 04/03/12 – 04/13/12
Kiln 2: 04/03/12 – 04/13/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 04/03/12 thru 04/13/12. The attached document explains each of the "malfunctions" for Kilns One & Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the stack gas flow monitor. Norlite has met with its consultant and a vendor offering new technology to measure stack gas flow and are in the process of determining its applicability. Norlite anticipates this new technology will be determined to be applicable for stack gas measurement in its APC system. Norlite and its consultant will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvancouver@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4 w/attachments

DCL: 2410



NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
04/03/12 - 04/13/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
4/6/2012	7:19:22	4/6/2012	8:33:18	1:13:56	56	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed / High CO's	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
4/7/2012	3:30:18	4/7/2012	3:34:36	0:04:18	57	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
4/7/2012	20:29:44	4/7/2012	20:34:16	0:04:32	58	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
4/7/2012	20:34:24	4/7/2012	20:34:48	0:00:24	59	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
4/10/2012	2:20:16	4/10/2012	2:20:58	0:00:42	60	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
4/10/2012	2:21:02	4/10/2012	2:23:54	0:02:52	61	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
4/10/2012	2:34:20	4/10/2012	2:34:40	0:00:20	62	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow



NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
04/03/12 - 04/13/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
4/3/2012	10:15:31	4/3/2012	10:40:27	0:24:56	168	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/I&E Cleaned the Probe	Stack Gas Flow Rate	Span	Adjusted Fuel Flow/I&E Cleaned Probe
4/3/2012	10:59:19	4/3/2012	11:20:34	0:21:15	169	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/I&E Troubleshooting Probe	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/3/2012	21:28:34	4/3/2012	21:31:08	0:02:34	170	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/3/2012	21:35:57	4/3/2012	21:58:50	0:22:53	171	Malfunction	Problems With the Recycle Tank Filling Up Caused Extra Water in the System Which Affected the Stack Gas Probe	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/5/2012	4:56:10	4/5/2012	4:56:53	0:00:43	172	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/5/2012	5:14:40	4/5/2012	5:15:03	0:00:23	173	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/8/2012	11:52:11	4/8/2012	12:03:01	0:10:50	174	Malfunction	Strong Wind Gust Out of the West and NorthWest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/8/2012	19:39:42	4/8/2012	19:40:07	0:00:25	175	Malfunction	Strong Wind Gust Out of the West and NorthWest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/8/2012	20:04:51	4/8/2012	20:11:23	0:06:32	176	Malfunction	Strong Wind Gust Out of the West and NorthWest Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/8/2012	20:25:01	4/8/2012	21:25:52	1:00:51	177	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/I&E Cleaning Probe	Stack Gas Flow Rate	Span	Adjusted Fuel Flow/I&E Cleaned Probe
4/8/2012	21:35:59	4/8/2012	21:36:19	0:00:20	178	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/8/2012	23:17:12	4/8/2012	23:17:37	0:00:25	179	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/8/2012	23:28:20	4/8/2012	23:40:23	0:12:03	180	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/10/2012	0:14:29	4/10/2012	0:14:56	0:00:27	181	Malfunction	I&E Troubleshot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/10/2012	2:56:50	4/10/2012	2:57:13	0:00:23	182	Malfunction	I&E Troubleshot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/10/2012	6:37:26	4/10/2012	6:38:28	0:01:02	183	Malfunction	I&E Troubleshot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow

4/10/2012	7:16:50	4/10/2012	7:17:22	0:00:32	184	Malfunction	I&E Troubleshoot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/10/2012	7:18:34	4/10/2012	7:19:08	0:00:34	185	Malfunction	I&E Troubleshoot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/10/2012	7:20:54	4/10/2012	7:23:17	0:02:23	186	Malfunction	I&E Troubleshoot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/10/2012	8:28:59	4/10/2012	8:29:19	0:00:20	187	Malfunction	I&E Troubleshoot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/10/2012	8:29:33	4/10/2012	9:08:54	0:39:21	188	Malfunction	I&E Troubleshoot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/10/2012	9:19:52	4/10/2012	11:27:32	2:07:40	189	Malfunction	I&E Troubleshoot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/10/2012	11:28:31	4/10/2012	11:58:47	0:30:16	190	Malfunction	I&E Troubleshoot Probe to Determine Cause of Faults. I&E Replaced the Faulty Probe after Troubleshooting Several Hours	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/11/2012	8:10:25	4/11/2012	8:11:14	0:00:49	191	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow	LGF Flow	Span	Adjusted Fuel Flow
4/11/2012	13:02:11	4/11/2012	13:06:51	0:04:40	192	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/12/2012	6:43:58	4/12/2012	6:44:31	0:00:33	193	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/12/2012	6:44:38	4/12/2012	6:46:09	0:01:31	194	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/12/2012	19:31:52	4/12/2012	19:33:34	0:01:42	195	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/12/2012	19:53:56	4/12/2012	19:54:30	0:00:34	196	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/12/2012	20:01:14	4/12/2012	20:12:55	0:11:41	197	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow